

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (SHL)**

**(Jointly Administered)**

**DEBTORS' STIPULATED ORDER**  
**TOLLING SHAREHOLDER RELEASED CLAIMS**

**WHEREAS**, the Court entered the Order Approving (I) Disclosure Statement for Fifth Amended Chapter 11 Plan, (II) Solicitation and Voting Procedures, (III) Forms of Ballots, Notices and Notice Procedures in Connection Therewith, and (IV) Certain Dates with Respect Thereto [Dkt. No. 2988] (“**Disclosure Statement Order**”) on June 3, 2021;

**WHEREAS**, the Disclosure Statement for Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors [Dkt. No. 2983] (“**Disclosure Statement**”) and Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors [Dkt. No. 2982] (“**Fifth Amended Plan**”) were provided to parties in interest pursuant to the Disclosure Statement Order;

**WHEREAS**, Section 10.9(a) of the Fifth Amended Plan provides for the tolling of Shareholder Released Claims (as defined in the Fifth Amended Plan);

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

**WHEREAS**, the Debtors filed the Twelfth Amended Plan (“**Plan**”) on September 2, 2021;<sup>2</sup>

**WHEREAS**, on September 1, 2021, the Court issued a bench ruling indicating that the Court would enter an order confirming the Plan;

**WHEREAS**, on September 3, 2021, the Court entered the Stipulated Order Tolling Shareholder Released Claims [Dkt. No. 3732] (the “**Original Stipulated Tolling Order**”);

**WHEREAS**, on September 17, 2021, the Court issued its Findings of Fact, Conclusions of Law, and Order Confirming the Plan [Dkt. No. 3787] (the “**Confirmation Order**”);

**WHEREAS**, certain parties appealed the Confirmation Order;

**WHEREAS**, on December 16, 2021, the U.S. District Court for the Southern District of New York entered an order (the “**District Court Order**”) vacating the Confirmation Order;

**WHEREAS**, on January 27, 2022, the U.S. Court of Appeals for the Second Circuit entered an order granting leave to appeal the District Court Order;

**WHEREAS**, consolidated appeals of the District Court Order are currently pending before the U.S. Court of Appeals for the Second Circuit;

**WHEREAS**, the Debtors, the Creditors Committee, the Ad Hoc Committee, and the MSGE Group believe that entry of a further order providing for tolling of Shareholder Released Claims is in the best interests of the Debtors and their Estates;

**WHEREAS**, the Mortimer Sackler Initial Covered Sackler Persons and the Raymond Sackler Family, through their respective counsel, consent to entry of this Order;

**NOW, THEREFORE**, the following is hereby stipulated and agreed to by the Parties,

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<sup>2</sup> Terms not otherwise defined herein have the meanings assigned to them in the Plan or the Shareholder Settlement Agreement.

subject to the approval of the Court:

1. If applicable law, an order in any proceeding or an agreement fixes a period for commencing or continuing an action or proceeding against a member of a Shareholder Family Group or Designated Shareholder Released Party based on a Shareholder Released Claim and such Shareholder Released Claim is or would be released pursuant to the Shareholder Releases or such action or proceeding is or would be enjoined by the Channeling Injunction, and such period (including after giving effect to any prior tolling) did not expire prior to the Original Stipulated Tolling Order, then such period does not expire with respect to such Shareholder Released Claim with respect to the Debtors, their Estates, any other Person or party claiming under or through any Debtor or any of their Estates, or the Releasing Parties, until the later of (i) the end of such period; (ii) March 27, 2023.

2. Entry of this Order shall not prejudice any rights of the Debtors, their Estates, any other Person or party claiming under or through any Debtor or any of their Estates, or any Releasing Party, or any rights of any member of a Shareholder Family Group, any Designated Shareholder Released Party, or any other person, relating to the application of equitable tolling or any similar doctrine concerning the timeliness of any Shareholder Released Claim.

3. This Order shall remain effective until the earliest of (1) the date upon which the Confirmation Order becomes a Final Order; (2) the date upon which any order confirming the Plan becomes a Final Order; and (3) March 28, 2023.

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*Counsel for the Raymond Sackler Family*

**SO ORDERED.**

Dated: August 2, 2022  
White Plains, New York

/s/ Sean H. Lane  
THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE